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Attorney for Platinum Loan Servicing, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re
FRE 355 Investment Group, LLC,

Debtor.

Case No.: 20-50628 SLJ 11
Cases Jointly Administered
Chapter 11
Case No.: 20-50631 SLJ 11

**RESPONSE IN OPPOSITION TO
OBJECTION TO CLAIM**

In re
Mora House, LLC,

Debtor.

Date: October 7, 2020
Time: 2:00 p.m.
Place: Courtroom 9 (Telephonic)
US Bankruptcy Court; Judge Johnson
280 South First Street
San Jose, California 95113

Platinum Loan Servicing, Inc. (“PLS”) as servicing agent for the beneficiaries of the mortgages on the real property owned by FRE 355 dba FRE 355 Investment Group, LLC (“FRE 355”) and Mora House, LLC (“Mora House”) (FRE 355 and Mora House are collectively referred to as “Debtors”), herein files its response in opposition to the Objections to Claims of Platinum Loan Servicing [ECF # 91] (“Objections”) filed by Debtors on September 1, 2020. For all these reasons, the Court should overrule and deny the Objections.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **THE OBJECTIONS ARE MERITLESS**

4 **AND SHOULD BE OVERRULED**

5 The Debtors' Objections are primarily based on confusion over PLS's accounting
6 descriptions for the various charges accrued on the account. To clarify the accruals on PLS's loan,
7 PLS has reformatted its beneficiary demand to eliminate the alleged confusion. The revised
8 demand is attached hereto as Exhibit 1 and is incorporated herein by reference.

9 As set forth in Exhibit 1, the following are the components of PLS's claim as updated
10 through October 1, 2020:

- 11 1. Undisputed principal balance: **\$10,937,000**. Debtors paid the loan through 6/30/19,
12 although default interest based on defaulted payments that commenced on 2/1/19;
- 13 2. 10% interest 8/1/19 to 9/22/20: **\$1,303,154.67**. Interest is paid in arrears, so the 8/1/19
14 date includes interest accruing in July 2019 after the last payment;
- 15 3. Late charges 10% on installments due 12/1/18 to 9/1/20: **\$200,511.74**;
- 16 4. Default interest + 5% 2/1/19 to 9/1/20: **\$820,274.94**;
- 17 5. Additional late fees on default interest: **\$86,584.52**;
- 18 6. Misc. charges foreclosure trustee and attorney's fees: **\$103,282.69**.

19 There is nothing incorrect or "overlapping" (as alleged in the Objection) about the
20 foregoing accruals.

21 Debtors also complain that the miscellaneous charges are not documented. Attached
22 hereto as Exhibits 2 and 3 are true and correct copies of documents evidencing the foreclosure
23 trustee fees and redacted attorney fee billings.

24 For all these reasons, the Objections are meritless and should be overruled and denied.

25 Dated: September 22, 2020

Lewis R. Landau
Attorney-at-Law

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27 By: /s/ Lewis R. Landau
Lewis R. Landau
28 Attorneys for Movant

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1. I am the Chief Executive Officer of Platinum Loan Servicing, Inc. (“PLS”) and have personal knowledge of the facts set forth herein.

3. I am readily familiar with PLS's books and records for servicing the Note. The total amount due on the Lenders' loan as of October 1, 2020 is **\$13,450,808.56** as accurately set forth in the revised beneficiary demand a true and correct copy of which is attached hereto as Exhibit 1. The following accurately states the amounts accruing and due for the subject time periods:

- a. Undisputed principal balance: **\$10,937,000**. Debtors paid the loan through 6/30/19, although default interest based on defaulted payments that commenced on 2/1/19;
- b. 10% interest 8/1/19 to 9/22/20: **\$1,303,154.67**. Interest is paid in arrears, so the 8/1/19 date includes interest accruing in July 2019 after the last payment;
- c. Late charges 10% on installments due 12/1/18 to 9/1/20: **\$200,511.74**;
- d. Default interest + 5% 2/1/19 to 9/1/20: **\$820,274.94**;

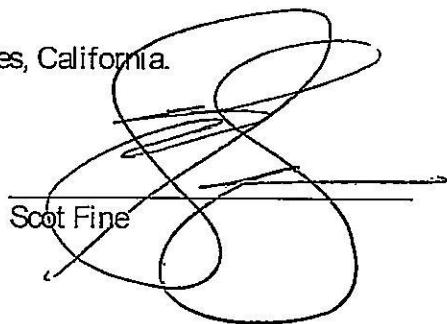
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- e. Additional late fees on default interest: **\$86,584.52;**
- f. Misc. charges foreclosure trustee and attorney's fees: **\$103,282.69.**

4. Attached hereto as Exhibits 2 and 3 and incorporated herein by reference are true and correct copies of documents evidencing the foreclosure trustee fees and redacted attorney fee billings charged to the Note account. In my experience, these are reasonable collection costs for a loan of this magnitude.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of October 2020 at Los Angeles, California.



Scot Fine

EXHIBIT 1

Platinum Loan Servicing Inc.

24025 Park Sorrento Suite 150
Calabasas, CA 91302
(818) 222-5222

10/1/2020

FRE 355 Investment Group, LLC by: Melvin Vaughn, Managing Member
10700 Mora Drive
Los Altos, CA 94024
Account: 10536

BENEFICIARY'S DEMAND FOR PAYOFF

Dear FRE 355 Investment Group, LLC by: Melvin Vaughn, Managing Member

You are authorized to use the following amounts to payoff the above-mentioned loan. All necessary legal documents will be forwarded to the trustee for Full Reconveyance upon receipt of payment in full.

Payoff Date	10/1/2020
Maturity Date	5/1/2019
Next Payment Due	9/1/2019
Interest Rate	10.000%
Interest Paid-To Date	8/1/2019
Principal Balance	\$10,937,000.00
Unpaid Interest	\$0.00
Accrued Interest From 8/1/2019 To 10/1/2020	\$1,303,154.67
Unpaid Late Charges (See Attachment)	\$200,511.74
	\$0.00
Unpaid Charges (See itemization attached)	\$1,010,142.15
Prepayment Penalty	\$0.00
Other Fees (See itemization attached)	\$45.00
Trust Balance	\$0.00
Payoff Amount	\$13,450,808.56

Please add **\$3,038.06** for each additional day past 10/1/2020.

We reserve the right to amend this demand should any changes occur that would increase the total amount for payoff. **Please note that this demand expires on 10/2/2020**, at which time you are instructed to contact this office for additional instructions (DEMAND FORWARDING FEES ARE DUE EVEN UPON CANCELLATION OF YOUR ESCROW).

Make disbursement check payable to: **Platinum Loan Servicing Inc.**

Sincerely,

Karen Larson
Platinum Loan Servicing, Inc.
818 222-5222
klarson@platinumloanservicing.com

Approved By: Larry Rabinoff CFO

ITEMIZATION OF UNPAID CHARGES

Date	Description	Interest Rate	Unpaid Balance	Accrued Interest	Total Due
12/1/2018	2018 Dec. Regular Late Fee @ \$9114.17	0.000%		\$0.00	\$9114.17
2/1/19 – 12/1/19	11 Regular 2019 Late Fees @ \$9114.17	0.000%		\$0.00	\$100,255.87
1/1/20 – 9/1/20	9 Regular late fees @ \$9114.17	0.000%		\$0.00	\$82,027.53
		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
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		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
		0.000%		\$0.00	
				Total	\$200,511.74

ITEMIZATION OF UNPAID CHARGES

Date	Description	Interest Rate	Unpaid Balance	Accrued Interest	Total Due
02/14/2019	NSF Payment Charges	0.000%	\$25.00	\$0.00	\$25.00
03/01/2019	Defaulted Interest Rate of 5% 2-1-19 - 9-1-20	0.000%	\$820,274.94	\$0.00	\$820,274.94
03/01/2019	Default Late Charges 5% 2-1-19 - 9-1-20	0.000%	\$86,584.52	\$0.00	\$86,584.52
04/15/2019	Advanced Trustee Fees	0.000%	\$17,538.34	\$0.00	\$17,538.34
04/15/2019	Advanced Trustee Fees	0.000%	\$5,062.91	\$0.00	\$5,062.91
02/14/2020	Advanced Trustee Fees	0.000%	\$426.87	\$0.00	\$426.87
02/14/2020	Advanced Trustee Fees	0.000%	\$1,790.35	\$0.00	\$1,790.35
02/14/2020	Advanced Trustee Fees	0.000%	\$1,705.12	\$0.00	\$1,705.12
02/14/2020	Advanced Trustee Fees	0.000%	\$4,177.69	\$0.00	\$4,177.69
02/14/2020	Advanced Trustee Fees	0.000%	\$14,471.84	\$0.00	\$14,471.84
02/14/2020	Advanced Trustee Fees	0.000%	\$852.48	\$0.00	\$852.48
07/06/2020	Advanced Appraisal Fees	0.000%	\$10,500.00	\$0.00	\$10,500.00
07/08/2020	Advanced Lawyer Fees	0.000%	\$1,564.00	\$0.00	\$1,564.00
07/15/2020	SBS Trust Deed Fees (Vacant Land)	0.000%	\$8,028.69	\$0.00	\$8,028.69
07/15/2020	Advanced Lawyer Fees	0.000%	\$6,000.00	\$0.00	\$6,000.00
07/16/2020	Advanced Lawyer Fees	0.000%	\$22,067.00	\$0.00	\$22,067.00
08/11/2020	Advanced Lawyer Fees	0.000%	\$9,891.00	\$0.00	\$9,891.00
09/22/2020	SBS Over Payment of Trutee Fees	0.000%	(\$1,501.60)	\$0.00	(\$1,501.60)
09/23/2020	Advanced Lawyer Fees	0.000%	\$683.00	\$0.00	\$683.00
				Total	\$1,010,142.15

ITEMIZATION OF OTHER FEES

Description	Amount
Demand Fee	\$0.00
Reconveyance Fee	\$45.00
Recording Fee	\$0.00
Forwarding Fee	\$0.00
Total	\$45.00

EXHIBIT 2



S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

INVOICE

Date: January 10, 2020

PLATINUM LOAN SERVICING, INC.
Attn: **KAREN LARSON**
24025 PARK SORRENTO #150
CALABASAS, CA 91302

Tax ID #: **95-3783564**
T.S. No: **2019-1305**
Loan No: **10536 (A)**

Borrower: **FRE 355, LLC DBA FRE 355 INVESTMENT GROUP, LLC**
Property Address: **10718 MORA DRIVE**
LOS ALTOS, CA 94024
Invoice Number: **21396**

Date	Description of Fees and Costs	Amount
03/14/2019	Trustee's Fees	\$14,721.25
03/15/2019	Additional Mail Cost (F)	\$30.00
03/15/2019	Mailings (10 Day)	\$210.00
03/15/2019	Record Notice of Default	\$34.00
03/15/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Notice of Rescission	\$34.00
03/15/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Substitution of Trustee	\$31.00
03/15/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	T.S.G. Cost	\$7,256.00
03/20/2019	Mailings (10 Day)	\$60.00
03/28/2019	Mailings (30 Day)	\$20.00
04/02/2019	Mailings (30 Day)	\$130.00
04/16/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Mailings (Notice of Sale)	\$420.00
06/25/2019	Mailings (Notice to Resident)	\$10.00
06/25/2019	Posting of Notice of Sale	\$125.00
06/25/2019	Publication of Notice of Sale	\$1,047.50
06/25/2019	Record Notice of Sale	\$28.00
06/25/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
06/25/2019	Trustee's Fees	\$14,531.25
07/30/2019	Postponement Cost	\$25.00
08/06/2019	Postponement Cost	\$25.00
08/07/2019	Mailings (Sale Postponement Letter)	\$400.00
08/07/2019	Postponement Cost	\$25.00

31194 La Baya Drive, Suite 106, Westlake Village, CA 91362
818.991.4600 Fax 818.874.9500 e-mail: info@sbstrustdeed.com
<http://www.sbstrustdeed.com>

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S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

09/05/2019	Mailings (Sale Postponement Letter)	\$400.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$400.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$400.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$400.00
12/06/2019	Postponement Cost	\$25.00
01/10/2020	Postponement Cost	\$25.00
01/10/2020	Trustee's Fees	\$2.78

SubTotal		\$41,250.78
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04/18/2019

Deposit

\$22,601.25

Total Due

\$18,649.53

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT.
PLEASE REMIT PAYMENT TO S.B.S. Trust Deed Network. YOU ARE A VALUED
CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

2 Advances To Upaid
Charges

SEE 1 + 2

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S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

INVOICE

Date: July 14, 2020

PLATINUM LOAN SERVICING, INC.
Attn: **KAREN LARSON**
24025 PARK SORRENTO #150
CALABASAS, CA 91302

Tax ID #: **95-3783564**
T.S. No: **2019-1305**
Loan No: **10536 (A)**

Borrower: **FRE 355, LLC DBA FRE 355 INVESTMENT GROUP, LLC**
Property Address: **10718 MORA DRIVE**
LOS ALTOS, CA 94024
Invoice Number: **23381**

Date	Description of Fees and Costs	Amount
03/14/2019	Trustee's Fees	\$14,721.25
03/15/2019	Additional Mail Cost (F)	\$30.00
03/15/2019	Mailings (10 Day)	\$210.00
03/15/2019	Record Notice of Default	\$34.00
03/15/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Notice of Rescission	\$34.00
03/15/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	Record Substitution of Trustee	\$31.00
03/15/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
03/15/2019	T.S.G. Cost	\$7,256.00
03/20/2019	Mailings (10 Day)	\$60.00
03/28/2019	Mailings (30 Day)	\$20.00
04/02/2019	Mailings (30 Day)	\$130.00
04/16/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Additional Mail Cost (F)	\$30.00
06/25/2019	Mailings (Notice of Sale)	\$420.00
06/25/2019	Mailings (Notice to Resident)	\$10.00
06/25/2019	Posting of Notice of Sale	\$125.00
06/25/2019	Publication of Notice of Sale	\$1,047.50
06/25/2019	Record Notice of Sale	\$28.00
06/25/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
06/25/2019	Trustee's Fees	\$14,531.25
07/30/2019	Postponement Cost	\$25.00
08/06/2019	Postponement Cost	\$25.00
08/07/2019	Mailings (Sale Postponement Letter)	\$400.00
08/07/2019	Postponement Cost	\$25.00

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S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

09/05/2019	Mailings (Sale Postponement Letter)	\$400.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$400.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$400.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$400.00
12/06/2019	Postponement Cost	\$25.00
01/10/2020	Postponement Cost	\$25.00
01/10/2020	Trustee's Fees	\$2.78
01/14/2020	Mailings (Sale Postponement Letter)	\$400.00
01/14/2020	Postponement Cost	\$25.00
01/16/2020	Postponement Cost	\$25.00
02/12/2020	Postponement Cost	\$25.00
02/20/2020	Postponement Cost	\$25.00
02/28/2020	Mailings (Sale Postponement Letter)	\$400.00
02/28/2020	Postponement Cost	\$25.00
03/20/2020	Postponement Cost	\$25.00
04/03/2020	Postponement Cost	\$25.00
04/13/2020	Mailings (Notice of Sale)	\$10.00
04/13/2020	Mailings (Sale Postponement Letter)	\$420.00
04/13/2020	Postponement Cost	\$25.00
04/13/2020	Record Notice of Rescission	- \$109.00
04/13/2020	Record Trustee's Deed Upon Sale	\$50.00
04/13/2020	Record Trustee's Deed Upon Sale (Surcharge Gov Code 27388.1)	\$75.00
04/13/2020	Trustee's Fees	- \$2.78
04/27/2020	Mailings (Sale Postponement Letter)	\$420.00
04/27/2020	Postponement Cost	\$25.00
05/07/2020	Mailings (Sale Postponement Letter)	\$420.00
05/07/2020	Postponement Cost	\$25.00
05/27/2020	Postponement Cost	\$25.00
06/02/2020	Postponement Cost	\$25.00
06/09/2020	Mailings (Sale Postponement Letter)	\$420.00
06/09/2020	Postponement Cost	\$25.00
07/07/2020	Mailings (Sale Postponement Letter)	\$420.00
07/07/2020	Postponement Cost	\$25.00

SubTotal	\$44,524.00
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04/18/2019	Deposit	-
		\$22,601.25
02/11/2020	Deposit	-
		\$23,424.35

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IN Unpaid Charges: Advances

3 - # 8



S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

Total Due

(\$1,501.60)

#10

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT.
PLEASE REMIT PAYMENT TO **S.B.S. Trust Deed Network**. YOU ARE A VALUED
CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

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S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

INVOICE

Date: July 14, 2020

PLATINUM LOAN SERVICING, INC.
Attn: **KAREN LARSON**
24025 PARK SORRENTO #150
CALABASAS, CA 91302

Tax ID #: **95-3783564**
T.S. No: **2019-1358**
Loan No: **10536 (B)**

Borrower: **MORA HOUSE, LLC**
Property Address: **VACANT LAND, LOS ALTOS, CA 94024**
APN: 331-14-067
Invoice Number: **23380**

Date	Description of Fees and Costs	Amount
04/02/2019	Trustee's Fees	\$14,721.25
04/04/2019	Additional Mail Cost (F)	\$30.00
04/04/2019	Mailings (10 Day)	\$370.00
04/04/2019	Posting of Notice of Default	\$75.00
04/04/2019	Record Notice of Default	\$34.00
04/04/2019	Record Notice of Default (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	Record Notice of Rescission	\$34.00
04/04/2019	Record Notice of Rescission (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	Record Substitution of Trustee	\$29.00
04/04/2019	Record Substitution of Trustee (Surcharge Gov Code 27388.1)	\$75.00
04/04/2019	T.S.G. Cost	\$7,256.00
04/04/2019	Trustee's Fee Adjustment (Cap file at \$500.00)	-
		\$14,221.25
04/16/2019	Additional Mail Cost (F)	\$30.00
04/16/2019	Mailings (30 Day)	\$10.00
07/17/2019	Additional Mail Cost (F)	\$30.00
07/17/2019	Mailings (Notice of Sale)	\$380.00
07/17/2019	Mailings (Notice to Resident)	\$10.00
07/17/2019	Posting of Notice of Sale	\$125.00
07/17/2019	Publication of Notice of Sale	\$2,259.69
07/17/2019	Record Notice of Sale	\$34.00
07/17/2019	Record Notice of Sale (Surcharge Gov Code 27388.1)	\$75.00
07/17/2019	Trustee's Fee Adjustment (Cap at \$500.00)	-
		\$94,648.75
07/17/2019	Trustee's Fees	\$94,648.75
08/08/2019	Mailings (Sale Postponement Letter)	\$380.00

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S.B.S. TRUST DEED NETWORK
SIMPLY BETTER SERVICE

08/08/2019	Postponement Cost	\$25.00
08/08/2019	Trustee's Fees	-
		\$80,117.50
08/09/2019	Trustee's Fee Adjustment (Cap @ \$500.00)	\$80,117.50
09/05/2019	Mailings (Sale Postponement Letter)	\$380.00
09/05/2019	Postponement Cost	\$25.00
10/04/2019	Mailings (Sale Postponement Letter)	\$380.00
10/04/2019	Postponement Cost	\$25.00
11/04/2019	Mailings (Sale Postponement Letter)	\$380.00
11/04/2019	Postponement Cost	\$25.00
12/06/2019	Mailings (Sale Postponement Letter)	\$370.00
12/06/2019	Postponement Cost	\$25.00
01/14/2020	Mailings (Sale Postponement Letter)	\$370.00
01/14/2020	Postponement Cost	\$25.00
01/16/2020	Postponement Cost	\$25.00
02/19/2020	Mailings (Sale Postponement Letter)	\$10.00
02/19/2020	Postponement Cost	\$25.00
02/20/2020	Postponement Cost	\$25.00
02/28/2020	Mailings (Sale Postponement Letter)	\$370.00
02/28/2020	Postponement Cost	\$25.00
03/20/2020	Postponement Cost	\$25.00
04/03/2020	Postponement Cost	\$25.00
04/15/2020	Mailings (Sale Postponement Letter)	\$400.00
04/15/2020	Postponement Cost	\$25.00
04/27/2020	Mailings (Sale Postponement Letter)	\$400.00
04/27/2020	Postponement Cost	\$25.00
05/07/2020	Mailings (Sale Postponement Letter)	\$400.00
05/07/2020	Postponement Cost	\$25.00
05/27/2020	Postponement Cost	\$25.00
06/02/2020	Postponement Cost	\$25.00
06/09/2020	Mailings (Sale Postponement Letter)	\$400.00
06/09/2020	Postponement Cost	\$25.00
07/07/2020	Mailings (Sale Postponement Letter)	\$400.00
07/07/2020	Postponement Cost	\$25.00
SubTotal		\$16,621.69
05/13/2019	Deposit	- \$8,593.00
Total Due		\$8,028.69

THE AMOUNT SHOWN IS DUE AND PAYABLE UPON RECEIPT. PLEASE REMIT PAYMENT TO **S.B.S. Trust Deed Network**. YOU ARE A VALUED CUSTOMER AND WE APPRECIATE YOUR CONTINUED PATRONAGE.

31194 La Baya Drive, Suite 106, Westlake Village, CA 91362
818.991.4600 Fax 818.874.9500 e-mail: info@sbstrustdeed.com

<http://www.sbstrustdeed.com>

S.B.S. is a debt collector attempting to collect a debt and any information will be used for that purpose

In Unpaid charges
9

FROM:		INVOICE																									
James J. Nicholas & Associates P.O. Box 7575 Menlo Park, CA 94026 Telephone Number: (650) 324-7946 Fax Number:		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: left; padding: 2px;">INVOICE NUMBER</th> </tr> <tr> <td style="padding: 2px;">6-1020-3</td> </tr> <tr> <th colspan="2" style="text-align: left; padding: 2px;">DATES</th> </tr> <tr> <td style="padding: 2px;">Invoice Date: 06/10/2020</td> </tr> <tr> <td style="padding: 2px;">Due Date:</td> </tr> <tr> <th colspan="2" style="text-align: left; padding: 2px;">REFERENCE</th> </tr> <tr> <td style="padding: 2px;">Internal Order #:</td> </tr> <tr> <td style="padding: 2px;">Lender Case #:</td> </tr> <tr> <td style="padding: 2px;">Client File #:</td> </tr> <tr> <td style="padding: 2px;">FHA/VA Case #:</td> </tr> <tr> <td style="padding: 2px;">Main File # on form: 6-1020-3</td> </tr> <tr> <td style="padding: 2px;">Other File # on form:</td> </tr> <tr> <td style="padding: 2px;">Federal Tax ID:</td> </tr> <tr> <td style="padding: 2px;">Employer ID:</td> </tr> </table>		INVOICE NUMBER		6-1020-3	DATES		Invoice Date: 06/10/2020	Due Date:	REFERENCE		Internal Order #:	Lender Case #:	Client File #:	FHA/VA Case #:	Main File # on form: 6-1020-3	Other File # on form:	Federal Tax ID:	Employer ID:							
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Main File # on form: 6-1020-3																											
Other File # on form:																											
Federal Tax ID:																											
Employer ID:																											
TO: Platinum Loan Servicing Inc. 24025 Park Sorrento #150 Calabasas, CA 91302 Attn: Scot R. Fine E-Mail: sfine@MarqueeFundingGroup.com Telephone Number: 1-818-222-5222 Fax Number: Alternate Number:																											
DESCRIPTION																											
<table style="width: 100%;"> <tr> <td style="width: 30%;">Lender:</td> <td style="width: 30%;">Platinum Loan Servicing Inc.</td> <td style="width: 20%;">Client:</td> <td style="width: 20%;">Platinum Loan Servicing Inc.</td> </tr> <tr> <td>Purchaser/Borrower:</td> <td>N/A</td> <td></td> <td></td> </tr> <tr> <td>Property Address:</td> <td>10718 Mora Dr</td> <td></td> <td></td> </tr> <tr> <td>City:</td> <td>Los Altos</td> <td></td> <td></td> </tr> <tr> <td>County:</td> <td>Santa Clara</td> <td>State:</td> <td>CA</td> </tr> <tr> <td>Legal Description:</td> <td>Book 331 Page 14 Lot 2</td> <td>Zip:</td> <td>94024</td> </tr> </table>				Lender:	Platinum Loan Servicing Inc.	Client:	Platinum Loan Servicing Inc.	Purchaser/Borrower:	N/A			Property Address:	10718 Mora Dr			City:	Los Altos			County:	Santa Clara	State:	CA	Legal Description:	Book 331 Page 14 Lot 2	Zip:	94024
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Legal Description:	Book 331 Page 14 Lot 2	Zip:	94024																								
FEES			AMOUNT																								
Appraisal Fees-Current Market Value			7,500.00																								
SUBTOTAL			7,500.00																								
PAYMENTS			AMOUNT																								
Check #:	Date:	Description:																									
Check #:	Date:	Description:																									
Check #:	Date:	Description:																									
SUBTOTAL			0																								
Thank you for your Business~			TOTAL DUE \$ 7,500.00																								

FROM:		INVOICE																		
James J. Nicholas & Associates P.O. Box 7575 Menlo Park, CA 94026 Telephone Number: (650) 324-7946 Fax Number:		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="2" style="text-align: left; padding: 2px;">INVOICE NUMBER</th> </tr> <tr> <td style="padding: 2px;">6-1020-4</td> </tr> <tr> <th colspan="2" style="text-align: left; padding: 2px;">DATES</th> </tr> <tr> <td style="padding: 2px;">Invoice Date: 06/10/2020</td> </tr> <tr> <td style="padding: 2px;">Due Date:</td> </tr> <tr> <th colspan="2" style="text-align: left; padding: 2px;">REFERENCE</th> </tr> <tr> <td style="padding: 2px;">Internal Order #:</td> </tr> <tr> <td style="padding: 2px;">Lender Case #:</td> </tr> <tr> <td style="padding: 2px;">Client File #:</td> </tr> <tr> <td style="padding: 2px;">FHA/VA Case #:</td> </tr> <tr> <td style="padding: 2px;">Main File # on form: 6-1020-4</td> </tr> <tr> <td style="padding: 2px;">Other File # on form:</td> </tr> <tr> <td style="padding: 2px;">Federal Tax ID:</td> </tr> <tr> <td style="padding: 2px;">Employer ID:</td> </tr> </table>		INVOICE NUMBER		6-1020-4	DATES		Invoice Date: 06/10/2020	Due Date:	REFERENCE		Internal Order #:	Lender Case #:	Client File #:	FHA/VA Case #:	Main File # on form: 6-1020-4	Other File # on form:	Federal Tax ID:	Employer ID:
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DESCRIPTION																				
<table style="width: 100%;"> <tr> <td style="width: 50%;"> Lender: Platinum Loan Servicing Inc. Purchaser/Borrower: N/A Property Address: Mora Dr APN# 331-14-067 City: Los Altos County: Santa Clara Legal Description: Book 331 Page 14 Lot 3 </td> <td style="width: 50%;"> Client: Platinum Loan Servicing Inc. State: CA Zip: 94024 </td> </tr> </table>				Lender: Platinum Loan Servicing Inc. Purchaser/Borrower: N/A Property Address: Mora Dr APN# 331-14-067 City: Los Altos County: Santa Clara Legal Description: Book 331 Page 14 Lot 3	Client: Platinum Loan Servicing Inc. State: CA Zip: 94024															
Lender: Platinum Loan Servicing Inc. Purchaser/Borrower: N/A Property Address: Mora Dr APN# 331-14-067 City: Los Altos County: Santa Clara Legal Description: Book 331 Page 14 Lot 3	Client: Platinum Loan Servicing Inc. State: CA Zip: 94024																			
FEES			AMOUNT																	
Appraisal Fees-Vacant Lot			3,000.00																	
SUBTOTAL			3,000.00																	
PAYMENTS			AMOUNT																	
<table style="width: 100%;"> <tr> <td style="width: 30%;">Check #:</td> <td style="width: 30%;">Date:</td> <td style="width: 40%;">Description:</td> </tr> <tr> <td>Check #:</td> <td>Date:</td> <td>Description:</td> </tr> <tr> <td>Check #:</td> <td>Date:</td> <td>Description:</td> </tr> </table>			Check #:	Date:	Description:	Check #:	Date:	Description:	Check #:	Date:	Description:									
Check #:	Date:	Description:																		
Check #:	Date:	Description:																		
Check #:	Date:	Description:																		
SUBTOTAL			0																	
Thank You for your Business~			<table style="width: 100%;"> <tr> <td style="width: 60%; text-align: right;">TOTAL DUE</td> <td style="width: 40%; text-align: right;">\$ 3,000.00</td> </tr> </table>	TOTAL DUE	\$ 3,000.00															
TOTAL DUE	\$ 3,000.00																			

EXHIBIT 3

Lewis R. Landau
 22287 Mulholland Hwy., # 318
 Calabasas, CA 91302

INVOICE

Platinum Loan Servicing, Inc.

Invoice Date	Invoice Number
05/05/2020	20469
Terms	Service Through
	04/30/2020

In Reference To: FRE 355 / Mora House (Labor)

Date	Services	Hours	Rates	Amount
04/13/2020		2.00	\$ 545.00/hr	\$ 1,090.00
04/14/2020		1.70	\$ 545.00/hr	\$ 926.50
04/15/2020		0.30	\$ 545.00/hr	\$ 163.50
04/16/2020		0.20	\$ 545.00/hr	\$ 109.00
04/17/2020		2.30	\$ 545.00/hr	\$ 1,253.50
04/18/2020		2.00	\$ 545.00/hr	\$ 1,090.00
04/19/2020		1.50	\$ 545.00/hr	\$ 817.50
04/20/2020		2.70	\$ 545.00/hr	\$ 1,471.50
04/22/2020		0.80	\$ 545.00/hr	\$ 436.00
04/23/2020		1.00	\$ 545.00/hr	\$ 545.00
04/27/2020		0.80	\$ 545.00/hr	\$ 436.00

04/28/2020		0.70	\$ 545.00/hr	\$ 381.50
04/29/2020		0.50	\$ 545.00/hr	\$ 272.50
04/30/2020		0.40	\$ 545.00/hr	\$ 218.00

In Reference To: FRE 355 / Mora House (Expenses)		
Date	Expenses	Amount
04/20/2020	CA and DE SOS status reports CL@S fees (\$125); DE SOS fees (\$20).	\$ 145.00
04/23/2020	Courtcall fee re 4/23 hearing.	\$ 28.00

Total Hours	16.90 hrs
Total Labor	\$ 9,210.50
Total Expenses	\$ 173.00
Total Invoice Amount	\$ 9,383.50
Previous Balance	\$ 0.00
Balance (Amount Due)	\$ 9,383.50

Lewis R. Landau
 22287 Mulholland Hwy., # 318
 Calabasas, CA 91302

INVOICE

Platinum Loan Servicing, Inc.

Invoice Date	Invoice Number
06/09/2020	20474
Terms	Service Through
	05/31/2020

In Reference To: FRE 355 / Mora House (Labor)				
Date	Services	Hours	Rates	Amount
05/01/2020		0.50	\$ 545.00/hr	\$ 272.50
05/04/2020		2.00	\$ 545.00/hr	\$ 1,090.00
05/05/2020		3.00	\$ 545.00/hr	\$ 1,635.00
05/06/2020		0.30	\$ 545.00/hr	\$ 163.50
05/07/2020		0.70	\$ 545.00/hr	\$ 381.50
05/19/2020		1.00	\$ 545.00/hr	\$ 545.00
05/20/2020		2.50	\$ 545.00/hr	\$ 1,362.50
05/26/2020		1.00	\$ 545.00/hr	\$ 545.00
05/27/2020		2.60	\$ 545.00/hr	\$ 1,417.00
05/28/2020		0.30	\$ 545.00/hr	\$ 163.50
05/29/2020		0.20	\$ 545.00/hr	\$ 109.00

In Reference To: FRE 355 / Mora House (Expenses)		
Date	Expenses	Amount

Lewis R. Landau
 22287 Mulholland Hwy., # 318
 Calabasas, CA 91302

INVOICE

Platinum Loan Servicing, Inc.

Invoice Date	Invoice Number
07/08/2020	20477
Terms	Service Through
	06/30/2020

In Reference To: FRE 355 / Mora House (Labor)				
Date	Services	Hours	Rates	Amount
06/01/2020		0.20	\$ 545.00/hr	\$ 109.00
06/02/2020		1.20	\$ 545.00/hr	\$ 654.00
06/04/2020		1.20	\$ 545.00/hr	\$ 654.00
06/05/2020		0.40	\$ 545.00/hr	\$ 218.00
06/09/2020		0.30	\$ 545.00/hr	\$ 163.50
06/10/2020		1.50	\$ 545.00/hr	\$ 817.50
06/17/2020		0.50	\$ 545.00/hr	\$ 272.50
06/22/2020		0.30	\$ 545.00/hr	\$ 163.50
06/24/2020		1.70	\$ 545.00/hr	\$ 926.50
06/25/2020		1.10	\$ 545.00/hr	\$ 599.50
06/26/2020		0.60	\$ 545.00/hr	\$ 327.00

In Reference To: FRE 355 / Mora House (Expenses)		
Date	Expenses	Amount
06/04/2020	Courtcall fee re status hearing.	\$ 28.00

Lewis R. Landau
 22287 Mulholland Hwy., # 318
 Calabasas, CA 91302

INVOICE

Platinum Loan Servicing, Inc.

Invoice Date	Invoice Number
08/03/2020	20489
Terms	Service Through
	07/31/2020

In Reference To: FRE 355 / Mora House (Labor)

Date	Services	Hours	Rates	Amount
07/06/2020		1.60	\$ 545.00/hr	\$ 872.00
07/07/2020		3.00	\$ 545.00/hr	\$ 1,635.00
07/10/2020		1.00	\$ 545.00/hr	\$ 545.00
07/14/2020		1.00	\$ 545.00/hr	\$ 545.00
07/21/2020		3.00	\$ 545.00/hr	\$ 1,635.00
07/22/2020		2.40	\$ 545.00/hr	\$ 1,308.00
07/23/2020		0.20	\$ 545.00/hr	\$ 109.00
07/25/2020		1.00	\$ 545.00/hr	\$ 545.00
07/27/2020		2.00	\$ 545.00/hr	\$ 1,090.00
07/28/2020		2.00	\$ 545.00/hr	\$ 1,090.00

In Reference To: FRE 355 / Mora House (Expenses)

Date	Expenses	Amount
07/22/2020	COS fee re mailing and postage for motion to dismiss cases.	\$ 122.00
07/28/2020	Copy and mail service re motion for relief from stay.	\$ 214.00
07/28/2020	Relief from stay filing fee.	\$ 181.00

Total Hours	17.20 hrs
Total Labor	\$ 9,374.00
Total Expenses	\$ 517.00
Total Invoice Amount	\$ 9,891.00
Previous Balance	\$ 22,067.00
Balance (Amount Due)	\$ 9,891.00

Payment History:

Date	Type	Payment Description	Amount
7/20/2020	Payment - Check		(\$22,067.00)

Lewis R. Landau
 22287 Mulholland Hwy., # 318
 Calabasas, CA 91302

INVOICE

Platinum Loan Servicing, Inc.

Invoice Date	Invoice Number
09/05/2020	20508
Terms	Service Through
	08/31/2020

In Reference To: FRE 355 / Mora House (Labor)

Date	Services	Hours	Rates	Amount
08/03/2020		0.50	\$ 545.00/hr	\$ 272.50
08/05/2020		1.20	\$ 545.00/hr	\$ 654.00
08/10/2020		0.80	\$ 545.00/hr	\$ 436.00
08/11/2020		1.80	\$ 545.00/hr	\$ 981.00
08/12/2020		3.00	\$ 545.00/hr	\$ 1,635.00
08/14/2020		0.30	\$ 545.00/hr	\$ 163.50
08/17/2020		0.50	\$ 545.00/hr	\$ 272.50
08/27/2020		3.00	\$ 545.00/hr	\$ 1,635.00
08/31/2020		0.80	\$ 545.00/hr	\$ 436.00

Total Hours	11.90 hrs
Total Labor	\$ 6,485.50
Total Invoice Amount	\$ 6,485.50
Previous Balance	\$ 9,891.00

1 **CERTIFICATE OF SERVICE**

2 I am employed in the County of Los Angeles, California. I am over the age of eighteen
3 (18) years and not a party to the within entitled cause, my business address is 22287 Mulholland
4 Hwy., # 318, Calabasas, CA 91302.

5 On October 1, 2020 I served a true and correct copy of the following documents:

6 **RESPONSE IN OPPOSITION TO OBJECTION TO CLAIM**

7 by effecting electronic delivery upon such persons that have agreed to accept service through the
8 Court's CM/ECF electronic noticing system as follows:

9 Bernard S. Greenfield on behalf of Creditor Richard Blanchard
10 bgreenfield@greenfieldlaw.com, ckaefer@greenfieldlaw.com
11 Robert G. Harris on behalf of Debtor FRE 355 Investment Group, LLC
12 rob@bindermalter.com
13 Lewis R. Landau on behalf of Creditor Platinum Loan Servicing, Inc.
14 lew@landaunet.com
15 Michael W. Malter on behalf of Debtor FRE 355 Investment Group, LLC
16 michael@bindermalter.com
17 Office of the U.S. Trustee / SJ
18 USTPRegion17.SJ.ECF@usdoj.gov
19 Suhey Ramirez on behalf of U.S. Trustee Office of the U.S. Trustee / SJ
20 suhey.ramirez@usdoj.gov, Patti.Vargas@UST.DOJ.GOV
21 Julie H. Rome-Banks on behalf of Debtor FRE 355 Investment Group, LLC
22 julie@bindermalter.com
23 Jennifer C. Wong on behalf of Creditor Wells Fargo Bank, N.A.
24 bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

25 I declare under penalty of perjury under the laws of the United States of America that the
26 foregoing is true and correct.

27 Executed this 1st day of October 2020 at Los Angeles, California.

28 /s/ Lewis R. Landau
Lewis R. Landau